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OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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MEMORANDUM

SUBJECT: Experimental Use Permit for Imidacloprid Products NUPRID 2F and

MALLET 0.5G for Control of Burrowing Shrimp on Oyster Beds in

Washington State.

FROM: N.E. Federoff, Wildlife Biologist

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TO: Joanne Edwards, Risk Manager Reviewer

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EFED has conducted a review of the proposed new uses for Imidacloprid. The assessment and conclusions are as follows:

Background

Washington State University (WSU) is applying for an EUP (Experimental Use Permit) for NUPRID 2F and MALLET 0.5G to control borrowing shrimp on oyster beds. The EUP is to be used to investigate the efficacy and non-target effects of Imidacloprid against burrowing shrimp in Willapa Bay and Grays Harbor in the State of Washington. The new products are for aquatic treatment only. The proposed use period is May through October 2010. NUPRID 2F (21.4% ai) is to be applied to 80 acres. MALLET 0.5G (0.5% ai) is to be applied to 30 acres. The highest current application rate for crops is 0.5 lbs ai/A. Under the current EUP, 1-2 lbs ai/A is proposed to be used on some of the acreage to be treated. All aerial and ground based applications must be made to exposed beds at low tide. Subsurface injections from a floating platform must be made to beds under water. A 200 ft buffer zone must be maintained for aerial applications and a 50 ft buffer zone must be maintained for hand held applications. All EUP restrictions should be followed. All spray drift management precautions and restrictions should also be

Conclusions

EFED's screening assessment suggests that exposure from this compound to an estuarine/marine system supports the intent of this EUP. Acute and chronic risk is demonstrated to estuarine/marine invertebrates (burrowing shrimp) in the sediment pore water (acute RQ = 5.20; chronic RQ = 19.50). This demonstrates efficacy of Imidacloprid to the borrowing shrimp. This assessment also demonstrates very low risk to the surrogate eastern oyster species (acute RQ < 0.0013). Risks within the Bay will likely be localized to the target area. Imidocloprid is shown to be less toxic to estuarine mollusks than it is to estuarine invertebrates by several orders of magnitude.

Environmental Fate of Imidacloprid

A summary of key environmental fate parameters (as determined for aquatic exposure modeling) is provided in Table 1. The major routes of dissipation for imidacloprid appear to be photolysis and anaerobic aquatic metabolism. Imidacloprid appears to be stable to aerobic soil metabolism. The chemical is mobile and is a major concern for ground waters, where there have been detections. Its transformation product imidacloprid guanidine is of concern as well. Imidacloprid may readily runoff dissolved in water and reach adjacent bodies of water. Since the chemical appears to be persistent under aerobic soil metabolism, imidacloprid may be available for runoff for periods exceeding one season. Potentially important environmental degradates include:

- 1) imidacloprid guanidine, 1-[(6-chloro-3-pyridinyl)methyl]-2-imidazolidinimine {Alias NTN 38014, NTN 33823}
- 2) imidacloprid olefin, 1-[(6-chloro-3-pyridin1yl)methyl]-1,3-dihydro-2H-imidazol-2-imine
- 3) imidacloprid urea, 1-[(6-chloro-3-pyridinyl)methyl]-2-imidazolidinone.{NTN 33519}.

It appears that photolysis plays an important role in the dissipation of imidacloprid, both in aqueous solution (half-life 0.2 days) and on soil (half-life 39 days). Another route of transformation that appears to be important for imidacloprid is anaerobic aquatic metabolism (half-life 27 days), with the formation of imidacloprid guanidine (66% at 249 days; 1-[(6-chloro-3-pyridinyl)methyl]-2-imidazolidinimine {Alias NTN 38014, NTN 33823}), a compound that appeared to be very persistent. Imidacloprid is very persistent under aerobic soil metabolism conditions (half-lives were 660, 188, 248 and 341 days in four soils).

Based on its K_{OC} values, imidacloprid would have medium mobility, with K_{OC} s ranging from 161 to 256 (based on nine soils, five domestic and four foreign). However, based on its K_{ads} values, it appears that imidacloprid is mobile and has the potential to leach to subsurfaces. The K_{ads} range is 0.96-4.76 for the same nine soils. On the other hand, imidacloprid guanidine appears to be less mobile than the parent imidacloprid (K_{OC} range 327-942; K_{ads} range 0.76-14.20).

Due to the very low octanol/water partition coefficient of imidacloprid, it is not expected to bioaccumulate in fish and the data requirement was waived.

Five terrestrial field dissipation studies confirm the findings in the laboratory, that under aerobic soil metabolism conditions, imidacloprid persists substantially. The half-lives were as follows: >365, >>365, 146, 107, and >120 days.

Table 1. Imidacloprid environmental fate parameters (as used for aquatic exposure modeling input).

Parameter	Input	Source
Solubility (ppm)	580	Product chemistry submissions
Molecular weight	255.66	http://chemfinder.cambridgesoft.com and Product Chemistry submissions.
Vapor Pressure (mm Hg or torr), 20 C	1.5E-09	Product chemistry submissions; Miles Technical & Safety Information sheet, March, 1992.
Henry's Law Constant (atm m3 mol -1)	4.0E-12	Registrant. Unable to locate original submission. SRC PhysProp Database lists as 1.65E-15 atm-m3/mole at 25 C as an estimated value apparently calculated from the vapor pressure and water solubility.
Hydrolysis t _{1/2} @ pH 7 (days)	Stable	MRID 42055337
Aerobic soil t _{1/2} (days)	520	MRIDs 452393-01, 02, 42073501; 90% upper bound confidence limit of mean
Aerobic aquatic t _{1/2} (days)	1040	2x the aerobic soil input value, per EFED guidance document
Photolysis t _{1/2} in water (days)	0.2 to 39	Input guidance & MRIDs 42256376; 42256377; with consideration of persistence in irradiated water in ecotoxicity studies.
Organic carbon partition coefficient - K_{oc} (mL/g)	178	MRIDs 425208-01 and 420553-38
Partition coefficient – K _d (mL/g)	2.4	Willapa Bay Study

Exposure Assessment in Willapa Bay

OPP has evaluated exposure data from two studies of Imidacloprid use for control of burrowing shrimp in Willapa Bay. The first is by Felsot and Rupert (2002).

In this study, water and sediment were collected directly in the treated plots or at various distances along a westerly transect from the plots. To establish transects, the center of each plot was located and personnel walked to assigned distances in the direction of tidal flow by following the flow lines left in the sandy sediment at low tide. Water samples were collected as the tide was coming in, and sediment samples were collected during low tide after the sediment was exposed. For this study, imidacloprid dissipation was monitored as the tide was rising in Willapa Bay. Four weeks after application, additional water samples were collected directly above the treated plots.

Over 99% of applied material dissipated from small plots within 24 h, but residues near the analytical detection limit were found in sediments 28 days later. At a distance of 152 meters along a transect from the plot in the direction of tidal flow, imidacloprid residues in water peaked within 10 minutes after initiation of tidal flow. Within 30 minutes, Imidacloprid residues were not detected, nor were residues detected in the water any time over the next month after application.

Within 15 meters from the edge of treated plots, average imidacloprid residues peaked at 17.7 μ g/L (0.017 mg/L) when the incoming water was 2 inches deep. At a distance of 152 meters from the treated plot, Imidacloprid was detected (average of 1.0 μ g/L) about five minutes after tidal flow started but quickly dissipated to below detection levels as the tide continued to rise. Twenty-four hours later, Imidacloprid was not detected in water sampled directly over the plots, nor was any detected 28 days after application either above or outside of the plot (maximum distance monitored was 152 m).

Plots were treated for burrowing shrimp control and then residues were monitored in sediment for 28 days. Initial concentration after application was 0.461 mg/kg dry weight. The half-life was less than 1 day, and 28 days later residues were still detectable (0.005 mg/kg) in sediments over the treated area. Within one day, residues in treated plots dropped to 0.0164 mg/kg and were not detected after 28 days (limit of detection at 0.0025 mg/kg). Imidacloprid rapidly dissipates from water by aqueous photolysis (half-life of 0.2 days) but is stable to hydrolysis at pH 7.

Chronic dry weight sediment concentration values (21 and 60 averages) are calculated by averaging the daily measured values with the interpolated daily values between them (assuming the concentration is zero at day 60). Chronic pore water concentration values are calculated from the dry weight values based on an assumption of equal volumes of water and solids in the sediment (OPP Standard Pond) and a Kd of 2.4 for Imidacloprid. See Table 2.

Table 2. Willapa Bay Sediment Concentrations

	Sediment Concentration (mg/kg (ppm) dry weight)	Calculated Concentration (Pore Water: mg/L (ppm))
Initial (Day 0)	0.461 (measured)	0.1921 (calculated)
(Day 1)	0.0164 (measured)	0.0068 (calculated)
(Day 14)	0.00267 (measured)	0.0011 (calculated)
(Day 28)	0.00472 (measured)	0.0020 (calculated)
(21-day Average)	0.0281 (calculated)	0.0117 (calculated)
(60-day Average)	0.0118 (calculated)	0.0049 (calculated)

The second study was conducted using small plot trials during 2006 – 2008 with Imidacloprid (Admire 1.6F, Bayer Corp.; Imida 2F, Etigra) and is the one submitted with this EUP request. Imidacloprid was applied aerially using helicopters to 7 commercial shellfish beds on July 2. Experimental beds were proposed by grower collaborators and selected based on degree of shrimp infestation, size, and proximity to untreated areas or beds treated with Sevin. A 20 acre bed located near the mouth of the North River (A90)

had been fallow for at 12 years, had a moderate to heavy shrimp infestation and was isolated from other shellfish beds, so provided a good site to study both efficacy and non-target impact to salmonids. A 10 acre bed near the mouth of the Cedar River (A40) was also used as a site to assess both non-target impact and efficacy. In this study, water was sampled for analysis of Imidacloprid concentration directly on the bed of three beds and in the adjacent channels of two beds. On-bed samples were taken by grab near the center of the bed, initially when depth of the in-coming tide reached six inches and on subsequent high tides at mid-depth of the water column. In-channel grab samples were taken at both maximum low and high tides at mid-depth of the water column.

Concentrations of Imidacloprid sampled over the beds dropped precipitously between 1 and 6 hours after treatment and were not detected afterward. At one hour concentrations immediately over the bed were 0.120 ppm, 0.040 ppm and 0.040 ppm at plots 90, 40 and 163 respectively.

Water concentrations in channels adjacent to two plots were recovered at 6 hours (0.000015 ppm), at 24 hours (0.00009 ppm), at 49 hours (0.00006 ppm) and at 74 hours (0.00003 ppm) after treatment (plot 90) and at 24 hours (0.0003 ppm), at 49 hours (0.00009 ppm) and at 74 hours (0.00006 ppm) after treatment (plot 40). (Method Reporting Limit = 0.00002 ppm). These timings were synchronized to the high tides.

Measured Imidacloprid concentrations in the water directly above the treated beds as the tidal flow begins are extremely variable, dissipate within 30 minutes to a few hours in both stindies and are not useful for risk assessment. In the second study, however, there were detections in the channels adjacent to the beds for up to three days (73 hours). Average concentrations in these adjacent channels are presented in Table 3 below.

Table 3. Average Imidacloprid Water Column Concentrations in Channels Adjacent to Treated Beds (Plots)

Time After Application	Water Column Concentrations
	(ppm)
(Day 0: 6 hours)	0.000015 (Plot 90 Only)
(Day 1: 24 hours)	0.000195
(Day 2: 49 hours)	0.000075
(Day 3: 73 hours)	0.000045

Risks to Terrestrial organisms

No risks to terrestrial organisms are expected because the proposed uses are all in aquatic areas. No exposure should occur under the subsurface application method. Aerial application is made to exposed beds at low tide. These areas will be submerged later in the day at high tide. Any effects, if they occur at all, will likely be very much localized due to the small acreages under the current EUP and that the area will be submerged soon after application.

Acute toxicity studies with honeybees show that imidacloprid is very highly toxic to non-target insects ($LD_{50} = 0.0039 - 0.078 \,\mu\text{g/bee}$). This is a concern for pollinators because

imidacloprid is a systemic pesticide which has been shown to translocate into the nectar and pollen of crop plants grown from treated seed. Studies with ornamental plants have shown that imidacloprid may also translocate into plant parts when the chemical is applied to the soil around the base of the plants. In these studies with ornamentals, detectable residues were found in flowers and leaves as long as 540 days after application to the soil. However, under the current application, risks to bees should be low since it is an aquatic use and not near bee habitats.

Risks to Aquatic organisms

EECs were developed from the study of imidacloprid use in Willapa bay. EFED's screening assessment suggests that exposure from this compound to an estuarine/marine system could result in acute and chronic risk to estuarine/marine invertebrates in the sediment pore water (acute RQ = 5.20; chronic RQ = 19.50). Imidocloprid is less toxic to estuarine mollusks than it is to estuarine invertebrates by several orders of magnitude. This assessment also demonstrates very low risk to the surrogate eastern oyster species (Acute RQ < 0.0013). Risks within the bay will likely be localized to the target area. Risks to freshwater fish or invertebrates were not assessed because the product will not be used in those areas.

Acute and chronic RQ's for evaluating toxic risk of imidacloprid exposure to estuarine/marine fish & invertebrates in pore water. RQ's are based on the sheepshead minnow (*Cyprinodon variegatus*) LC_{50} = 163 ppm, NOAEC = 2.3 ppm¹ and mysid shrimp (*Mysidopsis bahia*) EC_{50} = 0.037 ppm, NOAEC =

0.0006 ppm and Eastern Oyster (EC₅₀ > 145 ppm).

Use	Endpoint	Surrogate	EC ₅₀ (ppm)	NOAEC (ppm)	EEC Peak (ppm)	EEC 21 & 60-Day Ave. (ppm)	Acute RQ (EEC/ LC ₅₀)	Chronic RQ (EEC/ NOAEC)
Aquatic Pore Water	Estuarine/ Marine Fish	Sheepshead Minnow	163	2.3	0.1921	0.0049	0.0012	0.0021
Aquatic Pore Water	Estuarine/ Marine invertebrate	Mysid Shrimp	0.037	0.0006	0.1921	0.0117	5.20	19.50
Aquatic Pore Water	Estuarine/ Marine invertebrate	Eastern Oyster	>145	N/A	0.1921	N/A	< 0.0013	N/A

¹ Extrapolated value using an acute/chronic ratio from freshwater fish

Imidacloprid exposure is not expected to result in direct acute and chronic toxic effects to fish. Secondary adverse effects (fish life stage development) and adverse effects at the ecosystem level both to the organisms themselves as well as producing food chain and population disruptions are also unlikely due to the limited extent of the applications within the bays. Impacts of diminished invertebrate diversity on ecosystem integrity have not been explicitly evaluated but are also believed to be minimal. The rate of invertebrate recovery and/or the impact of decreased invertebrate diversity on higher trophic levels are an uncertainty but are likely to be minimal due to the small scope of the proposed use..

Risks to Endangered Species

Endangered estuarine invertebrates living in the pore water may be adversely affected from exposure to imidacloprid under this EUP. However, there were no estuarine invertebrates listed for that area in the EFED database.

Probit Slope Analysis

The probit slope response relationship is evaluated to calculate the chance of an individual event corresponding to the listed species acute LOCs. If information is unavailable to estimate a slope for a particular study, a default slope assumption of 4.5 is used as per original Agency assumptions of typical slope cited in Urban and Cook (1986).

Aquatic Species

Acute toxicity studies for imidacloprid did provide raw data and estimates of slopes for most fish and invertebrate species. A default slope of 4.5 was used for freshwater fish. Based on this slope, the corresponding estimate chance of individual mortality following exposure is 1 in 4.17×10^8 . Analysis of raw data from the aquatic acute toxicity studies provided slopes of 1.69 for freshwater invertebrates, 4.21 for estuarine/marine invertebrates and 6.82 for estuarine/marine fish. Based on these slopes, the corresponding estimate chance of individual mortality following imidacloprid exposure is 1 in 71.7 for freshwater invertebrates, 1 in 4.62×10^7 for estuarine/marine invertebrates and 1 in 1×10^{16} for estuarine/marine fish.

Incident Reports

The Agency's Ecological Incident Information System (EIIS) does contain reports of damage or adverse effects to non-target organisms attributed to the use of imidacloprid. There are incidents involving imidacloprid that have been noted reflecting lawn use and effects to non-target organisms: 1) surfaced dead grubs appeared to have been eaten by birds, resulting in the death of several young and adult robins; 2) possible runoff event from a lawn resulted in the death of 3,000 crayfish in a near-by stream; 3) "mad bee" disease in France; 4 & 5) lawn grass chemically burned by the application of the compound; and 6 &7) bee kills

#I007257-001 A private citizen of Myerstown, Pa. reported watering in pesticide (GrubEx) and then found that grubs had surfaced a couple of days later. He was very concerned to see that the birds that fed on the grubs died.

#I007892-007 Turf application resulted in possible runoff into McKenna Creek (Columbus, Ohio) killing about 3,000 crawfish. Pesticide application was made on 7/22, slight rain event occurred on 7/22 (0.01 inches) and on 7/23 (0.09 inches). On July 23 dead crawfish were found. Water samples taken two days after the incident showed imidacloprid residues at 0.17, 0.11, and 1.3 ppb. In all likelihood the initial concentration was much higher. Water samples also detected metolachlor residues.

#I010775-001 Protest by the National Union of French Beekeepers have targeted GAUCHO, made by Bayer AC. This product along with REGENT TS (fipronil) was used to coat sunflower seeds for protection against insects. The French Farm Ministry suspended use of GAUCHO over the concerns about the aberrant disorientated behavior ("mad bee disease") of honey bees that had been associated with the sunflower crop that had originated from the coated seeds. Imidacloprid residues were found in the nectar.

#I009445-035 September 1999, complaint from resident in Assonet, MA. Home owner applied GrubEx Season-Long Grub Control to his lawn in June. He claims that 50% of the lawn burned.

#I009445-036 Resident in Brooklyn, NY applied GrubEx Season-Long Grub Control to his lawn and the entire lawn turned brown.

I020700-001 Bayer reported bee kill.

#I021017 August 2009, bee kills reported after application to Linden trees in Pittsburgh PA. Bee deaths ceased when trees stopped blooming.

A lack of reported incidents does not necessarily mean that such incidents have not occurred. In addition, incident reports for non-target plants and animals typically provide information on mortality events only. Reports for other adverse effects, such as reduced growth or impaired reproduction, are rarely received.

Toxicity

Measures of ecological effects and exposure for Imidacloprid.

Assessment En	dpoint	Surrogate Species and Measures of Ecological Effect ¹	Measures of Exposure
		House sparrow acute oral $LD_{50} = 41.0 \text{ mg/kg}$ (2.5G) (MRID 420553-09)	
		Quail acute oral $LD_{50} = 152.3 \text{ mg/kg (MRID } 420553-08)$	
		Mallard duck acute oral LC ₅₀ >4797 ppm (MRID 420553-11)	•
	Survival	Bobwhite acute dietary $LC_{50} = 1536 \text{ ppm (MRID } 420553-10)$	Maximum residues on food items
		Bobwhite chronic reproduction NOAEC= 36 ppm (MRID 420553-12)	
Birds ²	Reproduction and growth	Mallard chronic reproduction NOAEC= 47 ppm (MRID 434665-01)	Maximum residues on food items
	Survival	Laboratory rat acute oral $LD_{50} = 424 \text{ mg/kg}$ (MRID 420553-31)	Maximum residues on food items
Mammals	Reproduction and growth	Laboratory rat oral reproduction chronic NOAEC = 250 ppm (MRID 422563-40)	Maximum residues on food items
		Bluegill sunfish acute LC ₅₀ >105 ppm (MRID 420553-14)	
•	Survival	Rainbow trout acute LC ₅₀ >83 ppm (MRID 420553-15)	Peak EEC ⁴
Freshwater fish ³	Reproduction and growth	Rainbow trout chronic (early life-stage) NOAEC=1.2 ppm and LOAEC=2.5 ppm (MRID 420553-20)	60-day average EEC ⁴
	Survival	Midge acute $EC_{50} = 0.069 \text{ ppm (MRID } 422563-04)$	Peak EEC ⁴
Freshwater Invertebrates	Reproduction and growth	Water flea chronic (life cycle) NOAEC= 1.3 ppm LOAEC= 3.6 ppm (MRID 420553-21)	21-day average EEC ⁴

Assessment En	dpoint	Surrogate Species and Measures of Ecological Effect ¹	Measures of Exposure
Estuarine/	Survival	Sheepshead minnow acute $LC_{50} = 163 \text{ ppm}$ (MRID 420553-18)	Peak EEC ⁴
Marine fish	Reproduction and growth	(no data)	60-day average EEC ⁴
Estuarine/	Survival	Eastern oyster acute $EC_{50} > 145 \text{ ppm (MRID}$ 422563-05) Mysid shrimp acute $LC_{50} = 0.037 \text{ ppm (MRID}$ 420553-19)	Peak EEC ⁴
Marine Invertebrates	Reproduction and growth	Mysid chronic NOAEL > 0.0006 ppm and LOAEC = 0.0013 (MRID 420553-22)	21-day average EEC ⁴
Terrestrial Plants ⁵	Survival and growth	(no data)	Estimates of runoff and spray drift to non-target areas
Insects	Survival	Honeybee acute contact LD_{50} = 0.0039 ug/bee (MRID 422730-03)	Maximum application rate
Aquatic Plants and			:
Algae	Survival	Green algae $EC_{50} > 10 \text{ ppm (MRID } 422563-74)$	Peak EEC

¹ If species listed in this table represent most commonly encountered species from registrant-submitted studies, risk assessment guidance indicates most sensitive species tested within taxonomic group are to be used for baseline risk assessments.

²Birds represent surrogates for amphibians (terrestrial phase) and reptiles.

³ Freshwater fish may be surrogates for amphibians (aquatic phase).

⁴One in 10-year return frequency.

⁵ Four species of two families of monocots - one is corn, six species of at least four dicot families, of which one is soybeans. $LD_{50} = Lethal$ dose to 50% of the test population; NOAEC = No observed adverse effect concentration; LOAEC = Lowest observed adverse effect concentration; $LC_{50} = Lethal$ concentration to 50% of the test population; $EC_{50}/EC_{25} = Effect$ concentration to 50%/25% of the test population.

Appendix A. Bibliography

Felsot A. S. and Rupert, J.R., 2002. Imidacloprid residues in Willapa Bay (Washington State) water and sediment following application for control of burrowing shrimp. J. Agric. Food Chem. 50: 4417-4423.

Appendix B. Environmental Fate and Transport Studies and Toxicity Studies for Imidacloprid

161-1 Hyd	lrolysis
MRID	Citation Reference
42055337	Yoshida, H. (1989) Hydrolysis of NTN 33893: Lab Project No: 88011/ESR: 99708. Unpublished study prepared by Nihon Tokushu Noyaku Seizo K.K. 34
	p.
161-2 Pho	todegradation-water
MRID	Citation Reference
42256376	Anderson, C. (1991) Photodegradation of NTN 33893 in Water: Lab Project Number: 88010: 101956. Unpublished study prepared by Nitokuno, ESR, Yuki Institute. 128 p.
161-3 Pho	todegradation-soil
MRID	Citation Reference
42256377	Yoshida, H. (1990) Photodegradation of NTN 33893 on Soil: Lab Project Number: 88012/ESR: 100249. Unpublished study prepared by Nihon Tokushu Noyaku Siezo K. K. 42 p.
162-1 Aer	obic soil metabolism
MRID	Citation Reference
42073501	Anderson, C.; Fritz, R.; Brauner, A. (1991) Metabolism of ?Pyridinyl-C 14-Methylene NTN 33893 in Sandy Loam under Anaerobic Conditions: Lab Project Number: 101241; M1250187-4. Unpublished study prepared by Bayer AgLeverkusen. 82 p.
45239301	Anderson, C.; Fritz, R.; Brauner, A. (1992) Metabolism of (Pyridinyl-(carbon 14)-Methylene) NTN 33893 in Loamy Sand Soil BBA 2.2 under Aerobic Conditions: Lab Project Number: M 1250187-4. Unpublished study prepared by Miles Incorporated. 83 p.
45239302	Fritz, C. (1992) Degradation of (Pyridinyl-(carbon 14)-Methylene) NTN 33893 in Silt Soil HOEFCHEN under Aerobic Conditions: Lab Project Number: M 1250187-4. Unpublished study prepared by Bayer AG. 54 p.
162-3 Ana	erobic aquatic metabolism
MRID	Citation Reference
42256378	Fritz, R.; Hellpointner, E. (1991) Degradation of Pesticides Under Anaerobic Conditions in the System Water/Sediment: Imidacloprid, NTN 33893: Lab Project Number: 1520205-5: 101346. Unpublished study prepared by Bayer AG, Leverkusen-Bayerwerk. 69 p.
163-1 Lea	ching /adsorption /desorption
MRID	Citation Reference
42055338	Fritz, R. (1988) Adsorption/Desorption of NTN 33893 on Soils: Lab Project
000000	, (12)

	Number: M 1310231/1: 99199. Unpublished study prepared by Bayer Ag. 50 p.
42055339	Fritz, R.; Brauner, ?. (1988) Leaching Behavior of NTN 33893 Aged in Soil:
	Lab Project Number: M 1210225/3: 99635. Unpublished study prepared by
	Bayer Ag. 45 p.
42520801	Williams, M.; Berghaus, L.; Dyer, D. (1992) Soil/Sediment Adsorption-
*	desorption of (carbon 14)-Imidacloprid: Lab Project Number: N3182101.
	Unpublished study prepared by ABC Labs, Inc. 70 p.
42520802	Williams, M.; Berghaus, L.; Dyer, D. (1992) Soil/Sediment Adsorption-
	desorption of (carbon 14)-NTN-33823: Lab Project Number: N3182102.
,	Unpublished study prepared by ABC Labs, Inc. 63 p.
43142501	Hellpointner, E. (1994) Degradation and Translocation of Imidacloprid (NTN
	33893) under Field Conditions on a Lysimeter: Lab Project Number: ME/6/95:
	M/1330351/6: 106426. Unpublished study prepared by Bayer AG, Institute for
	Metabolism Research. 74 p.
43315201	Hellpointner, E. (1994) Degradation and Translocation of Imidacloprid (NTN
	33893) under Field Conditions on a Lysimeter: Amendment to the Original
	Report: Project Nos. M 1330351-6; 106426-1. Unpublished study prepared by
•	Bayer AG. 12 p.
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164-1 Terrestrial field dissipation

MRID	Citation Reference
42256379	Rice, F.; Judy, D.; Koch, D.; et al. (1991) Terrestrial Field Dissipation for NTN 33893 in Georgia Soil: Lab Project Number: N3022101: 101987. Unpublished study prepared by ABC Laboratories, Inc. 422 p.
42256380	Rice, F.; Judy, D.; Koch, D.; et al. (1991) Terrestrial Field Dissipation for NTN 33893 in Minnesota Soil: Lab Project Number: N3022103: 101988. Unpublished study prepared by ABC Laboratories, Inc. 510 p.
42256381	Rice, F.; Judy, D.; Koch, D.; et al. (1991) Terrestrial Field Dissipation for NTN 33893 in California Soil: Lab Project Number: N3022102: 101989. Unpublished study prepared by ABC Laboratories, Inc. 561 p.
42256382	Rice, F.; Schwab, D.; Noland, P.; et al. (1992) Terrestrial Field Dissipation in Turf for NTN 33893 in Georgia Soil: Lab Project Number: 393553: 102603.
42256383	Unpublished study prepared by ABC Laboratories, Inc., and Miles Inc. 353 p. Rice, F.; Judy, D.; Noland, P.; et al. (1992) Terrestrial Field Dissipation in Turf for NTN 33893 in Minnesota: Lab Project Number: 393543: 102604. Unpublished study prepared by ABC Laboratories, Inc., and Agri-Growth
42256384	Research, Inc. 409 p. Noland, P.; Koch, A. (1991) Analytical Method for the Determination of NTN 33893 in Soil Samples: Lab Project Number: 39272-2: 101984. Unpublished study prepared by ABC Laboratories, Inc. 82 p.
42256385	Noland, P.; Koch, A. (1991) Analytical Method for the Determination of NTN 33893 in Turf Samples: Lab Project Number: 39354-2: 101981. Unpublished study prepared by ABC Laboratories, Inc. 64 p.
42734101	Bachlechner, G. (1992) Dissipation of Imidacloprid in Soil Under Field Conditions: Lab Project Number: RA-2082/91: 103948. Unpublished study prepared by Miles Inc. 89 p.
44631501	Noland, P. (1996) NTN 33893 Freezer Storage Stability Study in Soil and Turf: Lab Project Number: 107369: N3022301: N3022303. Unpublished study prepared by Bayer Corporation: ABC Laboratories, Inc. 86 p.

166-1 Ground water-small prospective

MRID	Citation Reference
44790102	Dyer, D. (1999) Progress Report #5 and Study Termination Request: Imidacloprid (ADMIRE)Small-Scale Prospective Ground-Water Monitoring Study, Montcalm County, Michigan, 1996: Lab Project Number: 5635.00: N3212401: N3212401-PR5. Unpublished study prepared by Bayer Corporation
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45094703	Lenz, M.; Helfrich, K. (2000) Imidacloprid (Admire)Prospective Ground-Water Monitoring Study, California, BroccoliProgress Report #12: Lab Project Number: 108939: H5034: N3212402. Unpublished study prepared by Bayer Corp. and LFR Levine. Fricke, Inc. 55 p.
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71-1 Avian Single Dose Oral Toxicity

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42055309	Stafford, T. (1991) NTN 33893 2. 5G: An Acute Oral LD50 with House
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	Unpublished study prepared by Mobay Corp. 23 p.
44059401	Hancock, G. (1996) NTN 33893 Technical: An Acute Oral LD50 with
	Mallards: (Final Report): Lab Project Number: 107354: N3710802.
	Unpublished study prepared by Bayer Corp. 32 p.

Schmuck, R. (1997) Acute Oral LD50 of Confidor WG 70 to Japanese Quail: (Final Report): Lab Project Number: 107904: E 293 1017-3: SXR/VW 178. Unpublished study prepared by Bayer AG Crop Protection. 35 p.

71-2 Avian Dietary Toxicity

MRID	Citation Reference
42055310	Toll, P. (1990) Technical NTN 33893: Subacute Dietary LC50 with Bobwhite Quail: Lab Project Number: N3721702: 100241. Unpublished study prepared by Mobay Corp. 39 p.
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71-4 Avia	n Reproduction
MRID	Citation Reference
42055312	Toll, P. (1991) Technical NTN 33893: A One Generation Reproduction Study with Bobwhite Quail: Lab Project Number: N3741701: 1011203. Unpublished study prepared by Mobay Corp. 114 p.
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MRID	Citation Reference

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MRID	Citation Reference
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42055315	Bowman, J.; Bucksath, J. (1990) Acute Toxicity of NTN 33893 to Rain bow Trout (Oncorhynchus mykiss): Lab Project Number: 37861: 100349.
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42055317	Young, B.; Hicks, S. (1990) Acute Toxicity of NTN 33893 To Daphnia magna: Lab Project Number: 37862: 10245. Unpublished study pre- pared by
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44558901 72-3 Acute	Bowers, L.; Lam, C. (1998) Acute Toxicity of 6-chloronicotinic acid (a metabolite of Imidacloprid) to Chironomus tentans Under Static Renewal Conditions: Lab Project Number: 96-B-123: 108127. Unpublished study prepared by Bayer Corporation. 24 p. 2 Toxicity to Estuarine/Marine Organisms
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42055318	Ward, G. (1990) NTN-33893 Technical: Acute Toxicity to Sheepshead Minnow, Cyprinodon variegatus, Under Static Test Conditions: Lab Project Number: J9008023E: 100354. Unpublished study prepared by Toxikon Environmental Sciences. 36 p.
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- 47303403 Doering, J.; Maus, C.; Schoening, R. (2005) Residues of Imidacloprid WG 5 in Blossom Samples of Cornus mas after Soil Treatment in the Field Application: 2003, Sampling: 2005. Project Number: G201801, P672034512, CORNUS/NTN33893WG5/DRENCH/NON/GLP. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer CropScience. 13 p.
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- 47303413 Maus, C.; Anderson, C.; Doering, J. (2004) Determination of the Residue Levels of Imidacloprid and Its Relevant Metabolites in Nectar, Pollen and Other Plant Material of Horse Chestnut Trees (Aesculus hippocastanum) After Soil Treatment Application and Sampling 2001. Project Number: MAUS/AM021, E/370/2009/1. Unpublished study prepared by Bayer CropScience Ag. 23 p.
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- 47523402 Suchail, S.; Guez, D.; Belzunces, L. (2001) Discrepancy Between Acute and Chronic Toxicity Induced by Imidacloprid and its Metabolites in Apis mellifera. Environmental Toxicology and Chemistry 20 (11): 2482-2486.
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